

EPSA Comments
Draft NERC Alert R-2020-06-10-01
Supply Chain Risk III
June 15, 2020

Pursuant to NERC's June 4, 2020 email to stakeholders, the Electric Power Supply Association (EPSA) submits the following comments on NERC's *DRAFT Recommendation to Industry—Supply Chain Risk III* (R-2020-06-10-01). EPSA appreciates the opportunity to provide feedback on this Draft Alert as our members take these issues with the utmost seriousness. If EPSA can assist in these efforts we offer our resources and support to NERC to chart a useful and helpful path forward.

EPSA has concerns about the scope of the Draft Alert and the proposed timeline for responses. As presently drafted, the Draft Alert would impose an unnecessary burden on registered entities and equipment suppliers who want to assist NERC and the Department of Energy by responding to the voluntary information collection. As proposed, responding would require an entity to initiate expansive information requests to those equipment manufactures which they are able to identify. At that point of the supply chain, equipment suppliers may be inundated with information requests from many of their customers. Thus, fulfilling the request would create a sizeable administrative burden at many points along the supply chain. An additional concern is how far back a registered entity is able to trace the source of certain equipment, or parts of various equipment, if their vendors are purchasing from other sources.

In order to assist in getting the most responses possible, EPSA suggests the following changes be made to the refine the Draft Alert so that registered entities can reasonably compile and submit the information requested.

Definitions

- Add a section that clearly defines what equipment NERC seeks to identify. EPSA suggests that this request be limited to transformers, as they have been identified by the Department of Energy as a specific area of concern. Given that there are many components of transformers, the request for suppliers of major pieces of the transformers should be limited to first tier subsuppliers only. Furthermore, given the spirit of Executive Order (EO) 13920, the request should be limited to transformers that fall within Defense Critical Electric Infrastructure Pathways.

Timeline

- The request should be limited to equipment purchased within the last 5 years. Given that assets regularly change hands, information sought outside of this window may send registered entities on a challenging hunt for records that may not yield information of value to NERC's mission. In addition, NERC should consider extending the timeline for responses to the Draft Alert so that industry has sufficient time to provide NERC with comprehensive responses to its inquiry.

Respectfully Submitted,

ELECTRIC POWER SUPPLY ASSOCIATION

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